

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

AMERICAN GENERAL LIFE INSURANCE  
COMPANY,

Plaintiff,

-against-

HANA SALAMON, JOEL KATZ, Individually  
and as Trustee for the HANA FAMILY TRUST,  
AARON KNOPFLER, Individually and as Trustee  
for the HANA FAMILY TRUST, and the HANA  
FAMILY TRUST,

Defendants.

Index No.  
09-CV-5428

**DECLARATION OF**  
**MICHELLE ARBITRIO, ESQ.**

Michelle Arbitrio, pursuant to 28 U.S.C. § 1746, declares and states as follows subject to the penalties for perjury of the United States of America:

1. I am a member of the firm Wilson, Elser, Moskowitz, Edelman & Dicker LLP, attorneys for Plaintiff American General Life Insurance Company ("American General") and submit this declaration in support of American General's Opposition to the defendants' Motion for Summary Judgment.

2. Annexed to this declaration are true and correct copies of the following documents:

<u>Exhibit</u>	<u>Description</u>
1.	Excerpt from Investigative File of Steve Mostecak for Hana Salamon matter.
2.	Complaint filed by American General, dated December 11, 2009.
3.	Answer filed by the Defendants, dated March 19, 2010.
4.	Correspondence from American General Counsel to Cheryl Lipsius regarding the voluntary cessation of premium payments.

5. Civil Docket for Salamon matter displaying Court Order by Kiyo A. Matusmoto, dated May 27, 2010.
6. Letter from Ira Lipsius with exhibits A and B, dated June 4, 2010.
7. English translation of exhibit A to June 4, 2010 letter from Ira Lipsius.
8. Accurate currency conversion of Romanian New Lei (2005) to US Dollar.

Dated: White Plains, New York  
July 21, 2010

  
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Michelle Arbitrio

**Certificate of Service**

Michelle Arbitrio hereby certifies, under penalty of perjury, that on July 21, 2010, I caused a true and correct copy of the foregoing to be served on the attorneys for the plaintiff at the address set forth below.

Ira Lipsius  
Schindel, Farman, Lipsius  
Gardner & Rabinovich LLP  
14 Penn Plaza – Suite 500  
New York, NY 10122

  
\_\_\_\_\_  
Michelle Arbitrio